

## **EXHIBIT 3**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

WANDA OVALLES, INDIVIDUALLY	:	
AND P.P.A. A. OVALLES AND	:	
WILSON OVALLES,	:	
	:	
v.	:	C.A. NO. 14-137M
	:	
SONY ELECTRONICS INC.;	:	
BEST BUY CO., INC.; FOXCONN	:	
INTERNATIONAL INC.; AND	:	
JOHN DOE CORPORATIONS 1-4,	:	

**AMENDED NOTICE TO TAKE VIDEO DEPOSITION**

**\*\*This notice supersedes the previously scheduled deposition of October 3, 2016\*\***

**DEPONENT:** Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, the plaintiff notices the video deposition of Sony Electronics, Inc. ("SEL"), through one or more SEL-designated persons, who must testify about information known or reasonably available to SEL, to be examined on the following: See Schedule A attached.

**DATE & TIME:** OCTOBER 5, 2016 at 9:00 a.m.

**LOCATION:** DeLUCA & WEIZENBAUM, LTD.  
199 North Main Street  
Providence, RI 02903

Please take notice that plaintiff will take the video deposition by stenographic means of the above-named deponent upon oral examination before a Notary Public of the State of Rhode Island, or some other duly qualified person, on the date and at the time set forth above and thereafter from day to day as the taking of the deposition may be adjourned, at the above location, at which time and place you are notified to appear and take such part in the examination as you may be advised and as shall be fit and proper.

Plaintiff,  
Wilson Ovalles  
By his Attorneys,

/s/ Miriam Weizenbaum  
Miriam Weizenbaum (#5182)  
**DeLUCA & WEIZENBAUM, LTD.**  
199 North Main Street  
Providence, RI 02903  
(401) 453-1500  
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UNITED STATES DISTRICT COURT  
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WILSON OVALLES, :  
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 :  
SONY ELECTRONICS INC.; :  
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INTERNATIONAL INC.; AND :  
JOHN DOE CORPORATIONS 1-4, :

**CERTIFICATE OF SERVICE**

I hereby certified that a true and accurate copy of the following document:

*Amended Notice to Take 30(b)(6) Video Deposition*

was sent by electronic mail on this 26<sup>th</sup> day of September 2016 to the following counsel of record:

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*Counsel for Foxconn International, Inc.*

A-1 Court Reporters  
200 Heroux Blvd. #811  
Cumberland, RI 02864

William White, Videographer  
121 Phenix Avenue  
Cranston, RI 02920

/s/ Miriam Weizenbaum

**SCHEDULE A**

That person with knowledge of Sony Electronics' answers and responses to the following interrogatories and requests as propounded to the plaintiffs on August 29, 2016 and to the extent they pertain to the US18650G6G (cell) and the VPG-BPS22 (battery pack):

Wanda Interrogatory numbers 4, 6 14, 15

Wilson Interrogatory numbers 1, 5, 6, 9, 11, 16, 18, 22, 23, 25

Wilson Second RFP numbers 18, 26, 28, 29, 30 and 57 a-c

Wanda Second RFP numbers 10, 16.